

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF IOWA**

IN RE:	Chapter 11
BDC Group Inc.,	Bankruptcy No. 23-00484
Debtor-in-Possession.	MOTION TO STAY CASE DEADLINES PENDING CHAPTER 7 TRUSTEE APPOINTMENT

COMES NOW the Debtor-in-Possession, BDC Group Inc., through its undersigned counsel, and under 11 U.S.C. § 105(a) hereby respectfully requests this Court stay the running of all deadlines and time limits involved in this case until no less than 14 days after a Chapter 7 trustee is appointed, stating the following in support:

1. The Debtor-in-Possession filed its Chapter 11 bankruptcy on June 13, 2024.
2. On January 25, 2024 Debtor's postpetition lender issued a notice of default under Debtor's postpetition financing and froze Debtor's bank accounts.
3. On January 26, 2024 Debtor stopped operations as it lacked assurances it would have money to pay its employees for the work they would perform that day.
4. On January 29, 2024 Debtor filed its Motion to Convert to Chapter 7.
5. Under 11 U.S.C. § 105(a) this Court "may issue any order ... that is necessary or appropriate to carry out the provisions of this title."
6. The Debtor submits that an order staying the running of all deadlines and timelines involved in this case until no less than 14 days after a Chapter 7 trustee is appointed is necessary and appropriate.
7. At this point the primary concern is preserving the estate's property and rights for the Chapter 7 trustee. It would be inappropriate for the Debtor to take positions or actions that might prejudice the Chapter 7 trustee or restrict their options to act as they see fit to benefit the estate and creditors, but likewise it would be inappropriate for the Chapter 7 trustee to be prejudiced by deadlines or time limits expiring or diminishing before they have a chance begin evaluating the case.
8. This Court has the authority under 11 U.S.C. § 105(a) to issue a temporary stay of these deadlines and the case's circumstances justify doing so.

9. The Debtor knows that certain parties in interest do not consent to the requested stay while others believe it is essential to preserve the estate. Therefore the Debtor respectfully requests the Court set a hearing on this matter so those arguments can be heard.

10. Debtor is filing with this Motion a proposed order granting it. The Debtor will submit clean PDF and Word copies of the proposed order to the Court via email.

WHEREFORE the Debtor-in-Possession respectfully requests this Court stay the running of all deadlines and time limits involved in this case until no less than 14 days after a Chapter 7 trustee is appointed, and grant such other relief as is just and equitable given the circumstances.

Dated this 29th day of January, 2024.

Respectfully submitted,

AG & BUSINESS LEGAL STRATEGIES

/s/ Austin Peiffer

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ATTORNEY FOR DEBTOR-IN-POSSESSION

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 29th day of January, 2024, a copy of the foregoing document was filed with the Clerk of Court for the United States Bankruptcy Court for the Northern District of Iowa using the CM/ECF system, and served electronically on those participants that receive service through the CM/ECF system.

Signed: /s/ Alex C. Tvedte